

LYNN LAW FIRM, LLP

ATTORNEYS AND COUNSELORS AT LAW

M & T BANK BUILDING - SUITE 750
101 SOUTH SALINA STREET
SYRACUSE, NEW YORK 13202

TELEPHONE (315) 474-1267
FAX (315) 474-4514
WWW.LYNNLAW.COM

64 EAST GENESEE STREET
SKANEATELES, NY 13152
TELEPHONE (315) 685-1207

PAUL R. SHANAHAN (1907-1988)

WILLIAM F. LYNN
PATRICIA A. LYNN-FORD
THOMAS F. SHANNON
WALTER F. BENSON
MARTIN A. LYNN
KELSEY W. SHANNON

March 8, 2021

Honorable Therese Wiley Dancks
U.S. District Court
Northern District of New York
James M. Hanley Federal Building
and U.S. Courthouse
100 South Clinton Street
Syracuse, NY 13261

Re: Chen v. State Farm Fire and Casualty Company, et al.
Civil Case No.: 5:20-CV-0938

Dear Judge Dancks,

I write on behalf of plaintiff in the above action to provide a status report.


As you may recall, the parties are conducting a mediation on March 10. Since our last conference, I have worked with State Farm's counsel to schedule depositions. At this time, we have the following depositions scheduled:

- Tuesday, Apr. 13 – Jing Ni Chen (Plaintiff's Wife) and Yi Lin Chen (Plaintiff's Daughter);
- Wednesday, Apr. 14 – Hao Chen (Plaintiff's Brother);
- Monday, April 19. – Plaintiff Xu Chen;
- Tuesday, April 20 – Ms. Susan Li (Nonparty, realtor subpoenaed by State Farm);
- Thursday, Apr 22 – Matt Psichoulas (State Farm Corp. Rep);
- Tuesday, Apr 27 – Dawn Chen (Plaintiff's Sister) and Mr. Chen's Mother; and
- Thursday, Apr 29 – Scott Storm (State Farm investigating attorney)

We are awaiting confirmation from the witnesses scheduled for the 27th and 29th but do not anticipate any problems.

Thank you for your attention to this matter and please feel free to contact me with any questions.

Very truly yours,



Kelsey W. Shannon

KWS/mg

cc: James P. Lagios, Esq.